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Attorney for Defendant
CONNIE DEVERS

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. CR-S-10-0223 JAM
)	
Plaintiff,)	ORDER ON APPOINTMENT OF MEDICAL
)	EXPERT FOR COMPETENCY
)	
v.)	
)	Judge: Hon. JOHN A. MENDEZ
CONNIE DEVERS)	
)	
Defendant.)	
)	
)	
)	

Comes now defendant, through counsel, and hereby requests the following expert be appointed as follows:

EXPERT NAME: JOHN M. GREENE, M.D., General and Forensic Psychiatry
Phone: (408) 871-1418
Fax: (408) 871-1419
15466 Los Gatos Blvd., Suite 109-206
Los Gatos, CA 95032

Tax Id No. TO BE PROVIDED

TYPE OF EXPERT: Medical and psychiatric forensic expert

I.
Introduction to Case

Charges: Defendant is charged with conspiracy to commit mail fraud and make false statements in loan applications, in violation of 18 USC 371, 1341, 1014; she is charged in approximately 39 counts in total. The charges stem from the allegation that the defendant conspired to commit mail fraud and false loan statements in connection with a large scale mortgage fraud conspiracy. The discovery to date consists of approximately 30,000 pages.

The defendant was to be seen by a prior expert agreed upon by the parties, Dr. Jason Roof of Sacramento, a doctor located by the government and agreeable to both parties. Ms. Devers was unable to provide an examination for Dr. Roof and the court therefore ordered defense counsel to locate and procure an expert closer to Ms. Devers' home in Castro Valley, California. Dr. Greene was highly recommended by Dr. Roof. Dr. Greene has agreed to lower his normally hourly rate of \$450 hourly to \$350 hourly.

II.
Work to be performed.

A. Review of defendant's prior and current medical records. This consists of the defendant's records for surgery for her stage IV breast cancer in August 2011, her post surgery treatment of chemotherapy and radiation, as well as her post chemotherapy and radiation treatment regimen of medications. Estimated: 4.0 Hours

B. Conduct a competency examination on Ms. Devers. This is not limited to but includes areas such as her condition and ability to undergo a trial in her current state, her competency to

stand trial, her ability to assist counsel in her defense, as well as issues of her current physical diagnosis and the issue of her memory loss due to “chemo brain.” Estimated: 10.0 hours.

C. Prepare a written report: Estimated: 6.0 hours

D. Preparation for evidentiary hearing and testimony at hearing. Estimated: 5 hours

III.
Expert experience.

The curriculum vitae of expert Greene is possessed by both parties. Dr. Greene performs competency evaluations and provides forensic psychiatrist services routinely in the Castro Valley area where the defendant resides; he was highly recommended by Dr. Jason Roof and did his residency at Stanford University.

The government and defense counsel agree upon this designation and appointment of Dr. Greene.

CERTIFICATION OF DEFENSE COUNSEL

I, Mark J. Reichel, hereby declare under the penalty of perjury as follows:

I was appointed by the court under the Criminal Justice Act to represent this defendant. That I have drafted and read the contents of this Request, and I know them to be true. Further, that the appointment of the defense expert in this case is essential to the effective representation of the defendant.

DATED: January 14, 2014

/Mark J. Reichel/ s
MARK J. REICHEL
ATTORNEY FOR CONNIE DEVERS

ORDER ON APPOINTMENT OF EXPERT

Having read and considered the request made herein, the Court finds the appointment of the defense expert as requested necessary for the adequate defense of the defendant.

It is so ordered. Advance approval is made for expenditure of funds in the amount of \$8,750.00.

January 17, 2014

/s/ John A. Mendez
THE HONORABLE JOHN A. MENDEZ
United States District Court Judge